

EXHIBIT 8

From: [Pak, Andrew \(LOS\)](#)
To: [Alexandria Swette](#)
Cc: [Sean S. Buckley](#); [Michael Rubin](#); [Daisy Joo](#)
Subject: RE: [EXTERNAL] RE: 23 Cr. 251
Date: Tuesday, March 11, 2025 2:28:39 PM

Hi Alex,

Thanks for your response. As we previously discussed, Mr. Gaddis is a records custodian whose previous testimony was limited in kind. Mr. Gaddis cannot authenticate an individual file previously produced to the government because Google records custodians can only authenticate complete productions using hash values. Moreover, the production in question was produced to the government, not to Mr. Amar. Any stipulation to admit the file would need to be between Mr. Amar and the government.

Given that Mr. Gaddis cannot provide the testimony you are looking for, we request that you withdraw the subpoena. We will file the motion to quash tomorrow if we do not otherwise hear from you.

Thank you,
Andrew Pak

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*Admitted in California, New York, and New Jersey

From: Alexandria Swette <Alexandria.Swette@kobrekim.com>
Sent: Monday, March 10, 2025 4:33 PM
To: Pak, Andrew (LOS) <APak@perkinscoie.com>
Cc: Sean S. Buckley <Sean.Buckley@kobrekim.com>; Michael Rubin <Michael.Rubin@kobrekim.com>; Daisy Joo <Daisy.Joo@kobrekim.com>
Subject: RE: [EXTERNAL] RE: 23 Cr. 251

Hi Andrew,

Thanks for your email. As recently as today, the defense attempted to offer a Google Drive document and its corresponding metadata during cross examination. The proffered metadata was not previously authenticated by Mr. Gaddis when he was on the stand as a Government witness. As such, we may need Mr. Gaddis to authenticate this additional document, assuming we are unable to come to an agreement with the parties.

Let us know if you are available this evening or tomorrow after 5 pm ET to discuss. We would like to avoid unnecessary litigation and are open to trying to obviate the need for Mr. Gaddis's testimony through a stipulation.

Best,
Alex

Alexandria Swette
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From: Pak, Andrew (Perkins Coie) <APak@perkinscoie.com>
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Cc: Sean S. Buckley <Sean.Buckley@kobrekim.com>; Michael Rubin <Michael.Rubin@kobrekim.com>; Daisy Joo <Daisy.Joo@kobrekim.com>
Subject: RE: [EXTERNAL] RE: 23 Cr. 251

Counsel

Thank you. While I was hopeful we could avoid litigation, in light of the fact that there is still an outstanding subpoena, and we haven't been able to resolve this issue, we intend to file a motion to quash your subpoena. We should have our filing in some time tomorrow or Wednesday morning at the latest.

Thank you,
Andrew Pak

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From: Daisy Joo <Daisy.Joo@kobrekim.com>

Sent: Monday, March 10, 2025 7:39 AM

To: Pak, Andrew (LOS) <APak@perkinscoie.com>

Cc: Sean S. Buckley <Sean.Buckley@kobrekim.com>; Alexandria Swette <Alexandria.Swette@kobrekim.com>; Michael Rubin <Michael.Rubin@kobrekim.com>

Subject: RE: [EXTERNAL] RE: 23 Cr. 251

Andrew,

We received the remaining witnesses from the Government and are considering whether and to what extent we may still need to call Mr. Gaddis. We appreciate your patience and should have an update for you this week.

Best,
Daisy

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From: Pak, Andrew (Perkins Coie) <APak@perkinscoie.com>

Sent: Thursday, March 6, 2025 3:18 PM

To: Daisy Joo <Daisy.Joo@kobrekim.com>

Cc: Sean S. Buckley <Sean.Buckley@kobrekim.com>; Alexandria Swette <Alexandria.Swette@kobrekim.com>; Michael Rubin <Michael.Rubin@kobrekim.com>
Subject: RE: [EXTERNAL] RE: 23 Cr. 251

Thanks Daisy. Can you confirm where the trial is at this point? As in, do you have a sense of when the Government will close its case?

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Subject: RE: [EXTERNAL] RE: 23 Cr. 251

Thanks, Andrew. We will get back to you.

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From: Pak, Andrew (Perkins Coie) <APak@perkinscoie.com>
Sent: Tuesday, March 4, 2025 1:32 PM
To: Daisy Joo <Daisy.Joo@kobrekim.com>; Alexandria Swette <Alexandria.Swette@kobrekim.com>
Cc: Sean S. Buckley <Sean.Buckley@kobrekim.com>; Michael Rubin <Michael.Rubin@kobrekim.com>
Subject: RE: [EXTERNAL] RE: 23 Cr. 251

Thanks Daisy,

Additionally, based on the initial list of topics that were sent over, we believe they are covered in Google's public help center [here](#). If you could take a look at that resource as well in considering whether there is information you seek that is not already available through public resources (as opposed to calling a Google witness), I think that would help us either align or narrow any point of dispute.

Thankyou,
Andrew Pak

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From: Daisy Joo <Daisy.Joo@kobrekim.com>
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Cc: Sean S. Buckley <Sean.Buckley@kobrekim.com>; Michael Rubin <Michael.Rubin@kobrekim.com>
Subject: RE: [EXTERNAL] RE: 23 Cr. 251

Hi Andrew,

Thanks for following up and apologies for our delayed response while we've been in court. We're reviewing Mr. Gaddis' testimony and will get back to you this week. Thank you.

Best,
Daisy

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Cc: Sean S. Buckley <Sean.Buckley@kobrekim.com>; Daisy Joo <Daisy.Joo@kobrekim.com>; Michael Rubin <Michael.Rubin@kobrekim.com>
Subject: [EXTERNAL] RE: 23 Cr. 251

Hi Alex,

I wanted to follow up on our discussion re your subpoena. Now that Mr. Gaddis has testified, do you still believe you have a need for a witness? If not, can you confirm that your subpoena is withdrawn? If so, can you send over the topics that we had been discussing below? Happy to jump on a call later today if helpful.

Thank you,
Andrew Pak

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From: Alexandria Swette <Alexandria.Swette@kobrekim.com>

Sent: Tuesday, February 25, 2025 4:02 PM

To: Pak, Andrew (LOS) <APak@perkinscoie.com>

Cc: Sean S. Buckley <Sean.Buckley@kobrekim.com>; Daisy Joo <Daisy.Joo@kobrekim.com>; Michael Rubin <Michael.Rubin@kobrekim.com>

Subject: 23 Cr. 251

Hi Andrew,

Thanks for your time earlier. Per our discussion, on behalf of Mr. Amar, below are the documents we would like to authenticate through Mr. Gaddis during his examination next week.

JSON	Google Document
DX OA 149	DX OA 237
GXG 544	GXG 543

In addition, there is another document from Google Analytics (GX 400). We've attached all of these for Mr. Gaddis' review.

Separately, we'll also send over a list of topics in connection with our outstanding subpoena for testimony.

Thanks,
Alex

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